

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE OPTICAL DISK DRIVE PRODUCTS
ANTITRUST

Case No. 3:10-md-2143 RS (JCS)

**DECLARATION OF JAMES PAGE
ON EPIQ CLASS ACTION CLAIMS
AND SOLUTIONS FEES AND
EXPENSES TO DATE**

This Document Relates to:
ALL INDIRECT PURCHASER ACTIONS

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I, James Page, declare as follows:

1. I am a Manager of Client Services employed by Epiq Class Actions & Claims Solutions, Inc. (“Epiq”), the Settlement Administrator in the above-captioned case. Epiq began working on this matter in January of 2020. I have worked for Epiq and GCG, a company acquired by Epiq in 2018, since 2013. I am a licensed attorney in Washington. I received my Juris Doctor degree from the University of Oklahoma Law School in 2006 and my Bachelor of Arts degree from the University of Oklahoma in 2003. The following statements are based on my personal knowledge and information provided by other Epiq employees working under my supervision, and if called on to do so, I could and would testify competently thereto. I submit this Declaration regarding Epiq’s fees and expenses for this matter to date in accordance with the Court’s December 14, 2020 Corrected Order Authorizing Distribution of Settlement Funds.

2. Epiq was retained to work on this matter in October of 2018. To date, Epiq has billed \$673,263.44 and been paid \$611,279.33. Epiq’s fees to date can be broken down as follows:

- Email Notice to the Class (twice): \$175,000.00
- Media Campaign: \$322,333.00
- Claims Processing and Claim Review: \$109,962.25
- Case Management: \$62,859.00
- Receipt and Processing of Incoming Mail: \$7,486.54
- IT and Systems Support: \$24,267.50
- Creation, Maintenance and Operation of the Case Toll Free Telephone Number:
\$3,647.55
- Creation, Maintenance and Operation of the Case Website: \$14,631.34
- Outgoing Mailings: \$305.50
- Fees related to Postage, operating the Case PO Box, Translations, and Copy Charges:
\$6,000.12
- Applicable Sales Tax: \$6,548.37
- Discount Applied to Fees and Expenses to Date: -\$59,777.73

3. Significantly, at the time Epiq was retained as the Settlement Administrator for this matter, the expectation was that administration of this matter would be concluded in roughly 12 months. As a result of the appeals related to these Settlements, Epiq has been overseeing these matters for over three years. In addition, Epiq's original estimates did not include any breakdown of the total costs to perform a check distribution for these settlements as it was not yet known whether Epiq would be retained to assist with the eventual distribution.

4. Moving forward, Epiq expects to invoice an additional \$115,669.49 in fees and expenses to complete the distribution and conclude this matter. These anticipated fees and expenses are broken down in additional detail below:

- \$900.00 to maintain and update the case website
- \$4,050.00 to maintain and update the case recorded toll free number as requested by the parties
- \$35,844.49 in fees and expenses related to preparing and mailing check payments for multiple distributions (including associated postage costs), handling undeliverable check payments and remails
- \$11,750.00 in fees and expenses related to overseeing the distribution account and filing tax returns associated with the settlement accounts
- \$38,725.00 in fees related to handling class member communications related to the digital payments, check payments and the settlements generally
- \$24,400.00 in fees related to general project oversight

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 24th day of March 2022, in Seattle, Washington.



 JAMES PAGE